Case No. 3:11-cv-04119-SI

Master File No. 3:07-md-01827-SI

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WHEREAS, plaintiffs P.C. Richard & Son Long Island Corporation, Marta Cooperative America, Inc., and ABC Appliance, Inc. ("Plaintiffs") filed a Complaint in the above-captioned action against defendant Mitsui & Co. (Taiwan), Ltd. ("Mitsui Taiwan"), among other defendants, on June 15, 2011.

Whereas, Plaintiffs and Mitsui Taiwan previously entered into a stipulation giving Mitsui Taiwan until October 6, 2011 to move to dismiss, answer, or otherwise respond to the Complaint. (*See* Dkt. #10; MDL Dkt. #3717.)

WHEREAS, Plaintiffs and Mitsui Taiwan have reached an agreement, pursuant to Civil Rule L.R. 6-1(a), pursuant to which Mitsui Taiwan shall have an additional extension until December 1, 2011 in which to move against, answer, or otherwise respond to the Complaint.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and Mitsui Taiwan, on the other hand, that Mitsui Taiwan's deadline to move to dismiss, answer, or otherwise respond to the Complaint will be December 1, 2011.

Dated: October 4, 2011

By: <u>/s/ Michael E. Mumford</u>

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Counsel for Defendant Mitsui & Co. (Taiwan), Ltd.

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1 2 3 4 5 6 7 8	By: /s/ Philip J. Iovieno Philip J. Iovieno BOIES, SCHILLER & FLEXNER LLP 10 North Pearl Street, 4th Floor Albany, NY 12207 (518) 434-0600 (Phone) (518) 434-0665 (Facsimile) piovieno@bsfllp.com  Counsel for Plaintiffs P.C. Richard & Son Long Island Corporation, Marta Cooperative America, Inc., and ABC Appliance, Inc.  Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.
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11	[PROPOSED] ORDER
12	IT IS SO ORDERED.
13	DATED this4thday ofOct ., 2011
14	Sugar Material
15	By: Hon. SUSAN ILLSTON
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